# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

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In re: : Chapter 11

BIG LOTS, INC., *et al.*, <sup>1</sup> : Case No. 24-11967 (JKS)

: (Jointly Administered)

Debtors. Related to D.I. 13, 1337, 1717,

1719, 1720, 1732

Hearing Date: January 21, 2025 at 1:00 p.m.

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# ALDI INC.'S WITNESS LIST FOR HEARING SCHEDULED FOR JANUARY 21, 2025 AT 1:00 P.M. (PREVAILING EASTERN TIME)

Aldi Inc. ("Aldi"), by counsel, submits the following witness list identifying the witnesses Aldi may call at the hearing scheduled for January 21, 2025 at 1:00 p.m. (prevailing Eastern time) in connection with (i) the Motion of Debtors for Entry of Interim and Final Orders (I) Establishing Procedures To Sell Certain Leases, (II) Approving the Sale of Certain Leases, and (III) Granting Related Relief [Docket No. 13], (ii) the Limited Objection of Premium Asset Management, Inc. to the Assumption and Assignment of Lease Pursuant to the Lease Sales Procedure [Docket No. 1337] filed by Premium Asset Management, Inc. ("PAM") as managing agent to certain landlords, (iii) Aldi Inc. 's Reply in Support of the Motion of Debtors for Entry of Interim and Final Orders (I) Establishing Procedures To Sell Certain Leases, (II) Approving the Sale of Certain Leases, and (III) Granting Related Relief ("Aldi's Reply") [Docket No. 1717],

<sup>&</sup>lt;sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors' corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

(iv) Exhibits A-J to Aldi Inc.'s Reply in Support of the Motion of Debtors for Entry of Interim and Final Orders (I) Establishing Procedures To Sell Certain Leases, (II) Approving the Sale of Certain Leases, and (III) Granting Related Relief [Docket No. 1719], (v) Declaration of Jordan Ford in Support of Entry of an Order (I) Approving the Assumption and Assignment of Lease to Aldi Inc. for Store No. 5230 (Vero Beach, FL) and (II) Granting Related Relief ("Ford Declaration") [Docket No. 1720], and (vi) Debtors' Reply to Objection to Debtors' Assumption and Assignment of Lease in Vero Beach [Docket No. 1732].

#### **WITNESSES**

Aldi may call the following witnesses at the hearing:

- 1. **Jordan Ford, Director of Real Estate for Aldi Inc.**, who will testify as to the facts contained in the Ford Declaration, and in support of Aldi's Reply.
- 2. All witnesses identified on any witness list filed by the Debtors, PAM, Gordon Brothers Retail Partners, LLC, or any other interested party.
- 3. Any witness called by the Debtors, PAM, Gordon Brothers Retail Partners, LLC, or any other interested party; and
  - 4. Rebuttal witnesses, as necessary or as Aldi determines to be appropriate.

Aldi reserves the right to supplement this list of witnesses to include any other witness which may be discovered or identified prior to the hearing. Aldi further reserves the right to call as additional witnesses those persons who may be necessary after considering evidence and argument at the hearing.

[continued on next page]

Dated: January 16, 2025

Respectfully submitted,

## CONNOLLY GALLAGHER LLP

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-and-

## RUBIN & LEVIN, P.C.

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Attorneys for Aldi Inc.